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May 16, 2005

HAND DELIVERY

Charles L. A. Terreni, Esq.
Chief Clerk and Administrator
Public Service Commission of South Carolina
Synergy Business Park
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RE: Generic Proceeding Established to Investigate Emergency Services Continuity Plans - Docket No. 2005-100-C

Dear Mr. Terreni:

Enclosed are the original and ten (10) copies of Sprint's Petition to Intervene in the above-styled docket. By copy of this letter, I am serving all parties of record.

I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me in the enclosed stamped self-addressed envelope. If you have questions, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/jcl

Enclosures

c: All Parties of Record w/enc.

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BEFORE THE

PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

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Generic Proceeding Established)	
to Investigate Emergency)	Docket No. 2005-100-0
Services Continuity Plans)	

PETITION OF SPRINT TO INTERVENE

COMES NOW United Telephone Company of the Carolinas (hereinafter, "Sprint"), pursuant to Rule103-836(A)(3) and other applicable provisions of the Rules of Practice and Procedure of the Public Service Commission of South Carolina ("Commission"), and hereby petitions the Commission for leave to intervene in the above-styled proceeding. In support of its Petition, Sprint respectfully shows as follows:

1.

The authorized representatives of Sprint in this proceeding are its undersigned counsel.

2.

On April 19, 2005, the Commission issued its Notice of Generic Proceeding in the above-referenced matter, in which the Commission gave notice of the establishment of "a generic docket to investigate emergency services continuity plans in general and their various ramifications."

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Sprint is an incumbent local exchange carrier operating in its authorized local exchange service territories in South Carolina

4.

Sprint asserts that the decisions made in this docket will have a substantial impact on the telecommunications market in South Carolina, in which Sprint is an active participant. Specifically, Sprint believes that the Commission's determinations could impact the terms and conditions under which Sprint provisions local exchange service to end-users in South Carolina.

5.

Since Sprint's rights and interests may be substantially affected by decisions made by the Commission in this proceeding, and since these rights and interests cannot be adequately represented by any other party in this docket, Sprint respectfully requests that it be granted leave to intervene and participate fully as a party of record. Sprint's participation in this docket will not unduly delay these proceedings or prejudice the rights of any other party. Accordingly, Sprint seeks to intervene in the above-styled docket.

WHEREFORE, in recognition of the foregoing, Sprint prays that the Commission grant Sprint's Petition to Intervene and that Sprint be made a party of record to the proceeding.

Respectfully submitted this 17th day of May, 2005.

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Sprint

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-and-

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Attorneys for Sprint

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Sprint's Petition to Intervene in Generic Proceeding

Established to Investigate Emergency Services Continuity

Plans

DOCKET NO.:

2005-100-C

PARTIES SERVED:

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Florence P. Belser, Esquire

ORS

P. O. Box 11263 Columbia, SC 29211

Stan Bugner

Verizon South, Inc.

1301 Gervais Street, Ste. 825

Columbia, SC 29201

PLEADING: PETITION TO INTERVENE BY SPRINT

My 17, 2005

Jackie C. Livingston, Paralegal